

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Universal Imagine Print Group, LLC
Attn: Tom Langer
6125 West Howard
Niles, Illinois 60714

Application No.: 96080113
Applicant's Designation: PRESSROOM
Subject: Offset Lithographic Printing
Date Issued:
Location: 6125 West Howard, Niles

I.D. No.: 031201ADS
Date Received: August 8, 2005
Expiration Date:

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of eleven sheetfed offset lithographic printing presses (Press No. 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, and 12) as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued;
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material), as further described in Attachment A. As a result, the source is excluded from both the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit.
 - ii. To limit the emissions of air pollutants from the source (specifically presses No. 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, and 12) to less than major source thresholds (i.e., 25 tons/year for volatile organic material for units constructed between November 15, 1992 and June 15, 2005,), as further described in Attachment A. As a result, the source is excluded from both the requirements under 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification.
 - iii. To limit the emissions of volatile organic material from the source to less than 25 tons/year. As a result, the source is excluded from the requirements for 35 Ill. Adm. Code Part 205, Emissions Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.

- c. This permit supersedes all operating permit(s) issued for this location.
- 2a. Emissions and operation of all sheetfed offset lithographic printing presses shall not exceed the following limits:

<u>Raw Material</u>	<u>VOM Content (Lb/Gal or Wt. %)</u>	<u>Material Usage (Month)</u>	<u>Usage (Year)</u>	<u>VOM Emissions (T/Mo)</u>	<u>(T/Yr)</u>
Ink	30 Wt. %	5.6 Ton	50 Ton	0.09	0.75
Fountain Solution	5 Wt. %	6.0 Ton	50 Ton	0.30	2.50
Clean-Up and Other Solvents	8.0 lb/gal	560 Gal	5,000 Gal	<u>2.30</u>	<u>20.00</u>
			Totals:	2.69	23.25

These limits define the potential emissions of VOM and are based on the maximum material usage, maximum VOM content, and 95% retention for the coldest ink. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. The emission of HAPs is listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
- 3a. This permit is issued based on owner or operator not causing or allowing operation of any sheetfed offset lithographic printing line unless total VOM content in the as-applied fountain solution is a 5 percent or less by volume, pursuant to 35 Ill. Adm. Code 218.407(a) (3) (A).
- b. This permit is based on owner or operator not to cause or allow the usage of cleaning solution, on any lithographic printing line unless the VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight; or VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F) pursuant to 35 Ill. Adm. Code 218.407(a) (4).
- c. This permit is issued based on owner or operator not to cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers, pursuant to 35 Ill. Adm. Code 218.407(a) (5).
- d. Pursuant to 35 Ill. Adm. Code 218.410(b) (2) this permit is issued based on owner or operator of fountain solutions to which VOM is added at the source with automatic feed equipment determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed

equipment which makes additions of VOM up to a pre-set level. The equipment used to make automatic additions must be installed, calibrated, operated, and maintained in accordance with manufacturer's specification.

- 4a. Pursuant to 35 Ill. Adm. Code 218.411(c) and (d) the Permittee shall collect and record the information specified below for all lithographic printing lines at the source:
 - i. The name and identification of each fountain solution additives, lithographic ink, and cleanup solvent used on any lithographic printing lines, recorded each month;
 - ii. The VOM content and the volume of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month; and
 - iii. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated on monthly and annual basis.
- b. Pursuant to 35 Ill. Adm. Code 218.410(e) the owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with the 30 percent by weight must for cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM); relying on vapor pressure of the cleaning solution to comply must keep records for such cleaning solutions used on any such line.
- c. The Permittee shall maintain all records required by 35 Ill. Adm. Code 218.411 at the source for a minimum period of three years and shall make all records available to the Illinois EPA upon request.
5. Pursuant to 35 Ill. Adm. Code 218.411(c) (3), the Permittee shall notify the Illinois EPA in writing of any violations, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.
- 6a. Within 90 days of a written request from the Illinois EPA the Permittee shall submit data on the volatile organic material content of the representative inks as applied determined by laboratory analysis in accordance with the 35 Ill. Adm. Code Section 218.105.
- b. The submitted data shall include: the VOM content of the inks, a justification of why these are representative, and a description of the sampling procedures, and documentation for the analysis.
- c. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 90 days.

7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
 - a. Total solvent usage (gallons/month and gallons/year);
 - b. Fountain solution usage (gallons/month and gallons/year);
 - c. Ink usage (lbs/month and lbs/year);
 - d. VOM content for each group of materials listed above (lbs/gallon or weight %); and
 - e. Monthly and annual VOM emissions with supporting calculations (tons/month and tons/year).
10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

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It should be noted that this permit has been revised to incorporate the addition of sheetfed offset Komori LS-840 lithographic printing press constructed September 1, 2004, and an addition of additional press not included in previous permits.

It should further be noted that the request to be reclassified as a Lifetime Operating Permit may not be granted due to the rules under 35 Ill. Adm. Code Part 203, "Major Stationary Sources Construction and Modification" in effect at time of construction of the presses covered in this permit.

If you have any questions on this, please call George Kennedy at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:GMK:psj

cc: Region 1

Attachment A

This attachment provides a summary of the maximum emission from the sheetfed lithographic printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The total ink, fountain solution, alcohol and clean-up solvent usage are limited the potential to emit of VOM to below major source thresholds. The resulting maximum emissions are below levels, (e.g., 25 tons per year of VOM), at which this source would be considered a major source for purposes of the Clean Air Act Permit Program and 35 Ill. Adm. Code Part 203. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

<u>Material</u>	E M I S S I O N S		
	VOM <u>(Tons/Yr)</u>	Single HAP <u>(Tons/Yr)</u>	Combined HAPs <u>(Tons/Yr)</u>
Ink	0.75		
Fountain Solution	2.50		
Clean-Up and Other Solvents	<u>20.00</u>		
Totals:	23.25	<u>< 10</u>	<u>< 25</u>

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